UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: JUN 26 1991

SUBJECT: Biological Technical Assistance Group (BTAG) Meeting

FROM: Roland Hemmett, Chairman Roland Hemmett
Biological Technical Assistance Group (2ESD)

TO: Jonathan Josephs, Environmental Engineer
New Jersey Superfund Branch II (2ERRD-NJSBII)

The following comments represent the consensus of the Region II Biological Technical Assistance Group (BTAG) review (meeting of 01 May 1991) of the Revised Remedial Investigation, Draft Feasibility Study and the Draft Baseline Risk Assessment for the Dayco Corporation/L.E. Carpenter Company Site located in Wharton, New Jersey.

The BTAG has several concerns regarding the wetlands associated with the site. We understand that there are approximately 70 acres of wetlands adjacent to the site and additional wetlands downstream of the site. Because the potential exists for contamination to effect these areas, all wetlands should be delineated as soon as possible. Field personnel should use the federal method outlined in the "Federal Manual for Identifying and Delineating Jurisdictional Wetlands" (Federal Interagency Committee for Wetland Delineation, 1989).

The BTAG also suggests that any potential contamination in the wetlands be characterized. Wetlands represent depositional areas and are frequently found to be contaminant sinks. At this time, several potential migration pathways for wetlands contamination exist; these include the Rockaway River (via flooding) and the Air Products drainage ditch. Contaminants were discovered in samples collected from the river and the ditch, strengthening suspicions that wetlands may have been contaminated. Therefore, the BTAG suggests that sediment and surface water samples be collected within the wetlands. We understand that the wetlands are large and that it will be difficult to sample the entire area; therefore, we suggest that sampling locations could be chosen based on the locations of potential contaminant migration pathways (e.g., the Rockaway River floodplain, drainage ditch inlet, etc.) into the wetlands. Analysis of all additional sediment samples should include total organic carbon (TOC) and grain size.

The purpose of an ecological risk assessment is to address all ecological resources potentially impacted by site contaminants including those resources associated with the adjacent and downgradient wetlands. The terrestrial ecological setting included in the risk assessment addresses only the area of the L.E. Carpenter facility, all other potential impacted areas were excluded. The BTAG noted that in the draft Risk Assessment (RA), the authors state that limited terrestrial fauna were "observed" on-site, and unique to sensitive terrestrial habitats "did not appear" to exist on-site. However, we feel that there is potential for terrestrial risk at this site. Further, a one day

environmental site assessment (apparently just a walk-through) is not adequate to provide the information necessary to support the results of the risk assessment. Discussions of site biota should not be limited to "observed" species; the literature should be reviewed to determine what species are likely to be present on-site, and those organisms should be included in the site characterization.

Therefore, we suggest that the draft Risk Assessment be revised to include additional discussion of risks to terrestrial biota. We also recommend that the U.S. Fish and Wildlife Service be contacted, through the USEPA-Environmental Impacts Branch, for an informal endangered species consultation (Informal Section 7). This will further assist in determining additional risk to biota at the site.

The BTAG has several comments regarding the conclusions drawn in the Feasibility Study (FS); the first of which concerns aquatic biota. Both the Remedial Investigation (RI) and the Draft RA report that aquatic life in the Rockaway River may be at increased risk from exposure to contamination in the river sediment. However, the FS implies that aquatic life will not be included as potential receptors. Further, in the discussion of fish on page 1-18 of the FS, the authors state only that "...control of fish ingestion does not appear warranted." This statement may be appropriate in addressing potential risk to human health, but does not insure that ecological risk is being adequately addressed. It should be noted that several resources of concern have been identified within the Rockaway River and these resources will have to be addressed during remediation.

In the discussion of metals of concern in sediments, the FS lists only lead and antimony. However, the RI stated (pages 61 through 63) that several metals (cadmium, lead, mercury and zinc) were detected at elevated concentrations in the Rockaway River; lead was detected at elevated concentrations in the Air Products drainage ditch; and several metals (chromium, lead, mercury, arsenic and cadmium) were detected in the Northeastern corner drainage feature. Antimony is never mentioned as a sediment/surface water contaminant in the RI. The other metals mentioned above should be used in any ecological risk assessment performed for this site. We would also like to emphasize that metal contamination in the Rockaway River will need to be addressed.

As our previous suggestions have indicated, we do not feel that ecological risk associated with sediment contamination of the river and wetlands has been fully addressed. Further, we question the following two conclusions (discussed on page 1-24 of the FS):

- "The Rockaway River is a losing stream in the vicinity of the site", and

- "...contaminants in the river sediment do not appear to have been deposited as a result of groundwater flow but rather from a combination of industrial activity in the general vicinity."

Until additional sediment samples have been collected and analyzed from the river and wetland areas and ecological risk associated with total sediment contamination has been completed, conclusions should not be made regarding sediment remediation.

Members of the BTAG would be interested in reviewing any other documents that pertain to the site. If you have any questions concerning our recommendations, please contact Shari Stevens of my staff at FTS 340-6994 (908-906-6994).

We are interested in obtaining feedback from Project Managers concerning the usefulness of BTAG comments. Please contact Shari if the comments have been useful or, especially, if they have not, so we can better adjust our reviews and procedures.

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| STEVENS | BRAUN | SPEAR | HEMMETT |
| 6/17/91 | 6/18/91 | 6/18/91 | 6/19/91 |

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